

EXHIBIT

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF OMAR MOTA

I, Omar Mota, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.
2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.
3. On September 11, 2001, I was present at 2 World Trade Center when the terrorist attacks of the World Trade Center Towers occurred.
4. I worked for ABM Maintenance as an elevator operator. On September 11, 2001, I was operating the freight elevator in Building 2. I was on the 44th floor when the second plane struck my tower; the elevator jolted and debris fell on me. I was able to leave the elevator and evacuated the building using the stairs. I was a few blocks away from Building 1 when it collapsed. I walked several miles before boarding a bus to my home in the Bronx; I didn't arrive home until 5:00p.m. that evening.

5. I was in New York City at Ground Zero when the planes hit the towers and I received physical injuries in the escape and collapse. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be compared to a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever.

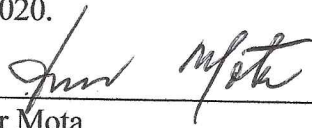
6. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: neck injuries and PTSD.

7. I sought medical attention for my injuries. Attached as Exhibit B to this Declaration is a true and correct copy of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

8. I was treated by a psychiatrist for several years following the attacks. I was unable to take the subway and my wife had to drive me to work from the Bronx daily. I did not return to work until February 2002. I had visions of the buildings collapsing on me.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 29 day of January 2020.



Omar Mota

**EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**